

CORRES. CONTROL  
OUTGOING LTR NO.

RF 13612

# EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.

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December 9, 1992

92-RF-13612

Robert M. Nelson, Jr.

Manager

DOE, RFO

Attn: R. J. Schassburger

## RESCOPING OF THE OPERABLE UNIT NO. 11 (OU 11) WEST SPRAY FIELD RCRA FACILITIES INVESTIGATION/REMEDIATION INVESTIGATION (RFI/RI) - RLB-0752-92

Pursuant to continuing discussions between the EG&G Rocky Flats, Inc. (EG&G) Operable Unit manager, DOE project management, and the Colorado Department of Health (CDH) project leads, a new proposal has been developed with respect to the original Interagency Agreement scope of work for OU 11. EG&G technical staff have made preliminary reviews of existing data. There is a good probability that no significant risk exists from OU 11; thus, any new data obtained should be collected in sufficient quantities and quality with the objective of supporting a justification for a "no further action" proposal.

As it now stands, OU 11 is designed as a phased approach with Phase I evaluating contamination from sources and soils and Phase II evaluating the overall nature and extent of contamination. Based on the Interagency Agreement (IAG) definition of a Phase I investigation, "downward" pathways such as leachate and groundwater are not evaluated for risk. Rather, these pathways are evaluated in the Phase II portion of the investigation. In the case of OU 11, where the risk is anticipated to be minimal, this phased approach serves to prolong an investigation that could be designed to evaluate risk in a single event. The overall schedule of the project could be significantly reduced by combining the phases into a single investigation. The up front cost impact to the project would be minimal since most of the data needed to support this effort are already being collected in Phase I or other projects.

Wells downgradient of OU 11 are already being installed as part of the OU 7 Phase I RFI/RI investigation and may be sufficient to satisfy project needs. There are monitoring wells already installed within OU 11. Soil borings of the alluvium are proposed in the Phase I OU 11 Work Plan contingent upon surficial soils sampling results. Upgradient soils, alluvium, and groundwater data is lacking. Existing data would be closely scrutinized for applicability to any identified data gaps. Overall cost to the project would be significantly decreased as a result of combining the phases and thus reducing the need for multiple contract procurement cycles, field mobilizations, and field investigations.

DIST.	INITIALS
BENJAMIN, A.	
BERMAN, H.S.	
BRANCH, D.B.	
CARNIVAL, G.J.	
COPP, R.D.	
DAVIS, J.G.	
FERRERA, D.W.	
HANNI, B.J.	
HARMAN, L.K.	
HEALY, T.J.	
HUBBARD, J.G.	
DEKER, E.H.	
KERSH, J.M.	
KIPP, W.A.	
KUESTER, A.W.	
LEE, E.M.	
MANN, H.P.	X
MARX, G.E.	
MCDONALD, M.M.	
MCKENNA, E.G.	
MONTGOMERY, J.K.	
MORGAN, R.V.	
POTTER, G.L.	
PIZZUTO, V.M.	
RILEY, J.H.	
SANDLIN, N.B.	
SHEPHERD, B.I.	
STEWART, D.L.	
SULLIVAN, M.T.	
SWANSON, E.B.	
WILKINSON, P.B.	
WILSON, J.M.	
ZANE, J.O.	X
REDACTED, R.H.	X
SMITH, T.A.	
SMITH, M.S.	X
SMITH, H.H.	X
SMITH, R.T.	X

CORRES CONTROL ☒   
Admin. Rec. ☒   
ENV. Tracking ☒

CLASSIFICATION:

UCN: ☐   
UNCLASSIFIED ☐   
CONFIDENTIAL ☐   
SECRET ☐

AUTHORIZED CLASSIFIER ☐   
SIGNATURE ☐

DOCUMENT CLASSIFICATION

REVIEW WAIVER PER

CLASSIFICATION OFFICE

IN REPLY TO RFP CO NO:

ACTION ITEM STATUS

☐ OPEN ☐ CLOSED

☐ PARTIAL

TR APPROVALS:

MSB: MSB

ORIG & TYPIST INITIALS

740:ccf

1/23 (Rev. 9/92)

ADMIN RECORD

A-OU11-000029

REVIEWED FOR CLASSIFICATION/UCN

1/13/93

1/13/93

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Discussions with the CDH project leads indicate that they approve of the idea of a single phase streamlined approach. A request was made of the CDH leads to provide guidance as to what would be the acceptable minimum quantity of data needed to support a justification for no further action. Preliminary verbal guidance from CDH indicates that the data collected must be able to support a risk assessment which would then be evaluated for its suitability to support a justification for no further action. The result of this would be that the project would be able to bypass the Phase II investigation and address a corrective measures study. As a minimum, significant cost reduction would result from the development of a single risk assessment rather than a multi-phased risk assessment.

In addition, it is projected that sufficient information could be finalized to satisfy the requirements of both Phase I and Phase II milestones within a time frame that should comply with Phase I milestone dates. This should not impact the IM/IRA milestones. CDH is supportive of this approach and willing to participate in scoping meetings. At this time it would be made clear that it would be in the best interest of all parties to accept potential minimum impacts to Phase I milestones in order to attain data sufficient to shorten Phase II by as many as four years.

CDH has verbally requested that the EG&G technical staff develop a proposal for this approach. A meeting between EG&G, DOE, and CDH has been tentatively scheduled for early December.

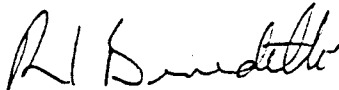
This approach is new and does not correspond to the original FY93 scope for the OU 11 investigation. Once an acceptable proposal is developed (projected to be completed by March, 1993), it would be possible to commence field work soon thereafter. This would almost guarantee that no Phase I milestones would be impacted. The current funding for FY93 is minimal and designed to implement major Phase I investigations in FY94. Current funding was designed to support project planning and mobilization during the second half of FY93. This was based on the current estimate that Phase I milestones are still attainable even with the major portion of funding shifted to FY94. The current FY93 funding is sufficient to support the re-scoping effort but not to implement field activities. The actual date for field implementation and subsequent impact to Phase I milestones is then dependent upon funding rather than technical limitations.

If DOE concurs with this approach, already acceptable in theory by CDH, written concurrence to pursue this strategy and shift current FY93 funding forward for proposal development is needed. It will be necessary to obtain concurrence for new scope through the Change Control Board.

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After the development of an acceptable single-phased approach, it would be advisable to explore the feasibility of obtaining funding sufficient to begin field implementation in FY93. This issue need not be evaluated until after the commencement of rescoping activities.

Please advise EG&G in writing of your guidance in this matter so that planning can begin immediately. Please contact either T. P. O'Rourke at extension 8577 or C. H. Hayes at extension 8559, both of Remediation Project Management if you have any questions. We welcome the opportunity to streamline efforts associated with OU 11 remediation and appreciate your assistance with this matter.



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EG&G Rocky Flats, Inc.

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